



Air Quality Permitting Statement of Basis

March 28, 2007

Tier I Operating Permit No. T1- 060054

Woodgrain Millwork, Fruitland

Facility ID No. 075-00001

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PROPOSED

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
Bbl	barrel
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Woodgrain Millworks Inc. (Woodgrain) regarding the operation of its facility located in Fruitland. This information was submitted based on the requirements to submit a Tier I operating permit application in accordance with IDAPA 58.01.01.382.

2. FACILITY DESCRIPTION

Woodgrain mills and finishes wood door components, moldings, and window parts.

3. FACILITY/AREA CLASSIFICATION

The facility is classified as a major facility as defined by IDAPA 58.01.01.008.10, because it emits or has the potential to emit a regulated air pollutant or pollutants in amounts greater than or equal to Tier I operating permit major source thresholds.

The facility is classified as a major facility as defined by IDAPA 58.01.01.205, because it emits or has the potential emit a regulated NSR pollutant in amounts greater than or equal to the applicable PSD major source threshold of 250 T/yr.

The facility is not a designated facility as defined in IDAPA 58.01.01.006.26.

The facility is located in Payette County, which is located within AQCR 63. This area is unclassifiable for all federal and state criteria pollutants. There are no Class I areas within 10 km of the facility.

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at the facility. This required information is entered into the EPA AIRS database. The AIRS/AFS facility classification is A. The SIC code defining the facility is 2431.

4. APPLICATION SCOPE

This permitting action involves the renewal of the facility's Tier I operating permit. This permitting action also modifies the Tier I operating permit by incorporating the applicable requires of Tier II operating permit No. T2-020024.

5. SUMMARY OF EVENTS

October 16, 2006	DEQ receives request for renewal
November 12, 2006	DEQ determines application complete

5.1 *Permitting History*

August 6, 1992	PTC No. 075-00001, Millwork products
November 24, 1993	PTC No. 075-00001, Prefinished molding and millwork
July 7, 1995	PTC No. 075-00001, PTC modification
October 2, 1995	PTC No. 075-00001, PTC modification - Exemption request
April 24, 1996	PTC No. 075-00001, PTC Amendment
September 5, 1996	PTC No. 075-00001, PTC Amendment

September 20, 1996	PTC No. 075-00001, PTC Modification
February 20, 1998	PTC No. 075-00001, Dimensional lumber / Wood shavings bagging operation
January 22, 1999	PTC No. 075-00001, PTC Modification
May 28, 2002	PTC No. 075-00001, PTC Modification
December 11, 2002	Initial Tier I Operating Permit No. 075-00001

6. PERMIT ANALYSIS

6.1 *Basis of Analysis*

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- Tier I operating permit application, received June 27, 1995.
- Tier I Operating Permit application received DATE\
- Tier II Operating Permit No. T2-020024, issued 11//06
- Guidance developed by the U.S. Environmental Protection Agency (EPA) and DEQ

6.2 *Emissions Description and Emissions Inventory*

The total controlled potential to emit of PM₁₀ emissions from wood processing and handling equals 4.11 T/yr. The uncontrolled potential to emit of PM₁₀ is the same because the cyclones and baghouses at the facility are considered process equipment necessary for the reuse and handling of wood chips, wood shavings, and sanderdust. The specific emission rates of each baghouse and cyclone are as follows:

EMISSIONS INVENTORY

Source Description	PM ₁₀	
	lb/day	T/yr
Cyclone B	0.99	0.18
Cyclone C	0.68	0.12
Cyclone I	0.19	3.42E-02
Baghouse G	9.60E-04	1.75E-04
Baghouse E	2.16E-03	3.94E-04
Cyclone J	6.31	1.15
Cyclone K	6.31	1.15
Baghouse L	1.42E-02	2.58E-03
Baghouse M	1.80E-02	3.29E-03
Cyclone D	3.46-02	6.31E-03
Cyclone H	7.94	1.45

Emissions Inventory	
Pollutant	Permitted Emissions (TPY)
NO _x	0.0
SO ₂	0.0
CO	0.0
PM ₁₀	4.11
VOC	813.6
TAPS/HAPS	24.9
Total:	838.5

7. REGULATORY ANALYSIS

7.1 IDAPA 58.01.01.382 – Significant Modification

This permitting action is a significant permit modification because it involves significant changes to existing emission limits, monitoring, recordkeeping, and reporting. Significant permit modifications are subject to the requirements of IDAPA 58.01.01.382.

7.2 New Source Performance Standards (NSPS) – 40 CFR 60

No equipment associated with this facility is affected by any NSPS standards.

7.3 National Emission Standards for Hazardous Air Pollutants (NESHAPS) – 40 CFR Parts 61 & 63

40 CFR 63, Subpart QQQQNational Emission Standards for Hazardous Air Pollutants:
Surface Coating of Building Products

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for wood building products surface coating sources. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

40 CFR 63.4681Am I subject to this subpart?

In accordance with 40 CFR 63.4681(a) and (b), the requirements of this subpart apply to this permittee because the permittee owns or operates an existing, surface coating of wood building products facility that is located at a major source of HAP emissions, and had used 1,110 gallons per year of coatings.

40 CFR 63.4682What parts of my plant does this subpart cover

In accordance with 40 CFR 63.4682(a) and (e), the permittee is subject to this subpart because it is an existing facility. 40 CFR 63.4682(b) applies to the permittee.

40 CFR 63.4683When do I have to comply with this subpart?

The permittee is an existing facility subject to the compliance date (3 years after May 28, 2003) given in 40 CFR 63.4683(b). The compliance date is May 28, 2006. The permittee is also subject to the notification requirements of 40 CFR 63.4683(d).

40 CFR 63.4690What emission limits must I meet?

40 CFR 63.4690(b) applies to the permittee because it is an existing source. Specifically, the permittee has chosen to demonstrate compliance with the rolling 12-month emission rate limit of 1.93 lb HAP/gal solids of Table 2 using the compliant materials or emission rate without add-on controls options in 40 CFR 63.4741 and 40 CFR 63.4751, respectively. 40 CFR 63.4690(c) generally applies to the permittee.

40 CFR 63.4691What are my options for meeting the emission limits?

In accordance with 40 CFR 63.4691, the permittee may use the compliant material, emission rate without add-on controls, and emission rate with add-on controls options provided in this section to demonstrate compliance with 40 CFR 63.4690(b). At the request of the permittee, this permit contains the compliant material and emission rate without add-on controls options for demonstrating compliance with 40 CFR 63.4690. The permittee may apply either of the compliance options to an individual coating operation or to multiple coating operations as a group or to the entire affected source. The permittee may use different compliance options for different coating operations or at different times on the same coating operation. However, the permittee may not use different compliance options at the

same time on the same coating operation. If the facility switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by 40 CFR 63.4730(c), and the permittee must report it in the next semiannual compliance report required in 40 CFR 63.4720.

40 CFR 63.4692What operating limits must I meet?

The permittee is not required to meet any operating limits because it has chosen to use the compliant material option or the emission rate without add-on controls option for any of the coating operations which it uses.

40 CFR 63.4693What work practice standards must I meet?

The permittee is not required to meet any work practice standards because it has chosen to use the compliant material option or the emission rate without add-on controls option to demonstrate compliance with.

40 CFR 63.4700What are my general requirements for complying with this subpart?

In accordance with 40 CFR 63.4700(a)(1), the permittee must be in compliance with the 1.93 lb HAP/gal emission rate limit in 40 CFR 63.4690 at all times because it has chosen the compliant material option or the emission rate without add-on controls option to demonstrate compliance with the emission rate limit. In accordance with 40 CFR 63.4700(b), the permittee must also operate and maintain your affected source according to the provisions in 40 CFR 63.6(e)(1)(i).

40 CFR 63.4701What parts of the General Provisions apply to me?

The permittee must comply with the applicable General Provisions of 40 CFR 63.1 through 63.15 listed in Table 4 of Subpart QQQQ that applies to it.

40 CFR 63.4710What notifications must I submit?

In accordance with 40 CFR 63.4710(a), the permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply by the dates specified in those sections, except as provided in 40 CFR 63.4710(b) and 40 CFR 63.4710(c) of this section. In accordance with 40 CFR 63.4710(b) and because the permittee is considered an existing source, the permittee must submit the Initial Notification no later than 120 days after May 28, 2003. In accordance with You must submit the Notification of Compliance Status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4740, 40 CFR 63.4750, or 40 CFR 63.4760 that applies to your affected source. The Notification of Compliance Status must contain the information specified in paragraphs (c)(1) through (9) of this section and in 40 CFR 63.9(h).

40 CFR 63.4720What reports must I submit?

Semiannual compliance reports must be submitted in accordance with 40 CFR 63.4720(a). 40 CFR 63.4720(b) and (c) do not apply to the permittee because it has chosen to not use the emission rate with add-on controls option.

40 CFR 63.4730What records must I keep?

The requirements of 40 CFR 63.4730(a) through (c)(3) apply to the permittee because it has chosen to use the compliant material and emission rate without add-on controls options. The requirements of 40 CFR 63.4730 (c)(4)(i) through (v) and (k) do not apply to the permittee because the permittee has chosen not to use the emission rate with add-on controls option. 40 CFR 63.4730(d) through (f) and (j) generally apply to the permittee. The requirements of 40 CFR 63.4730(g) through (h) apply to the permittee because it has chosen to use the compliant material and emission rate without add-on controls options.

40 CFR 63.4731In what form and for how long must I keep my records?

The requirements of 40 CFR 63.4731(a) through (c) apply to the permittee.

40 CFR 63.4740By what date must I conduct the initial compliance demonstration?

In accordance with 40 CFR 63.4740, the permittee must complete the initial compliance demonstration for the initial compliance period as specified in this section. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4683 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. The initial compliance demonstration includes the calculations according to 40 CFR 63.4741 and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the applicable emission limit in 40 CFR 63.4690, and that you used no thinners or cleaning materials that contained organic HAP.

40 CFR 63.4741How do I demonstrate initial compliance with the emission limitations?

40 CFR 63.4741 presents the requirements for demonstrating initial compliance with the emission limits 40 CFR 63.4690(b) using the compliance material option. 40 CFR 63.4741 and 40 CFR 63.4741(a) through (e) apply to the permittee because it has stated that it will use the compliant material option to demonstrate compliance with the emission limits of 40 CFR 63.4690(b).

40 CFR 63.4742How do I demonstrate continuous compliance with the emission limitations?

40 CFR 63.4742 presents the requirements for demonstrating continuous compliance with the emission limits 40 CFR 63.4690(b) using the compliance material option. 40 CFR 63.4741 and 40 CFR 63.4742(a) through (d) apply to the permittee because it has stated that it will use the compliant material option to demonstrate compliance with the emission limits of 40 CFR 63.4690(b).

40 CFR 63.4750By what date must I conduct the initial compliance demonstration?

In accordance with 40 CFR 63.4750, the permittee must complete the initial compliance demonstration for the initial compliance period as specified in this section. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4683 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. The permittee must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate a 12-month organic HAP emission rate at the end of the initial 12-month compliance period. The initial compliance demonstration includes the calculations according to 40 CFR 63.4751 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in 40 CFR 63.4690(b).

40 CFR 63.4751How do I demonstrate initial compliance with the emission limitations?

40 CFR 63.4751 presents the requirements for demonstrating initial compliance with the emission limits using the emission rate without add-on controls option. Also, in accordance with 40 CFR 63.4751, any coating operation for which the permittee uses the emission rate without add-on controls option is not required to meet the operating limits or work practice standards required in 40 CFR 63.4692 and 63.4693, respectively. 40 CFR 63.4751 and 40 CFR 63.4751(a) through (h) apply to the permittee because it has stated that it will use the emission rate without add-on controls option to demonstrate compliance with the emission limits of 40 CFR 63.4690(b).

40 CFR 63.4752How do I demonstrate continuous compliance with the emission limitations?

40 CFR 63.4752 presents the requirements for demonstrating continuous compliance with the emission limits 40 CFR 63.4690(b) using the compliance material option. 40 CFR 63.4741 and 40 CFR 63.4751(a) through (h) apply to the permittee because it has stated that it will use the compliant material option to demonstrate compliance with the emission limits of 40 CFR 63.4690(b).

40 CFR 63.4760By what date must I conduct the initial compliance demonstration?

The requirements of 40 CFR 63.4760 pertain to demonstrating initial compliance using the emission rate with add-on controls option. 40 CFR 63.4760 does not apply because the permittee has chosen to use the compliant material and emission rate without add-on controls options to demonstrate compliance with 40 CFR 63.4690(b).

40 CFR 63.4761How do I demonstrate initial compliance with the emission limitations?

The requirements of 40 CFR 63.4760 pertain to demonstrating initial compliance using the emission rate with add-on controls option. 40 CFR 63.4760 does not apply because the permittee has chosen to use the compliant material and emission rate without add-on controls options to demonstrate compliance with 40 CFR 63.4690(b).

40 CFR 63.4762[Reserved]

40 CFR 63.4762 does not apply to the permittee.

40 CFR 63.4763How do I demonstrate continuous compliance with the emission limitations?

The requirements of 40 CFR 63.4763 pertain to demonstrating continuous compliance using the emission rate with add-on controls option. 40 CFR 63.4763 does not apply because the permittee has chosen to use the compliant material and emission rate without add-on controls options to demonstrate compliance with 40 CFR 63.4690(b).

40 CFR 63.4764What are the general requirements for performance tests?

The requirements of 40 CFR 63.4764 pertain to performance tests required by 40 CFR 63.4760. 40 CFR 63.4760 & 40 CFR 63.4763 not apply to the permittee because the permittee has chosen to use the compliant material and emission rate without add-on controls options to demonstrate compliance with 40 CFR 63.4690(b).

40 CFR 63.4765How do I determine the emission capture system efficiency?

40 CFR 63.4765 does not apply to the permittee.because it does not operate an add-on control device.

40 CFR 63.4766How do I determine the add-on control device emission destruction or removal efficiency?

40 CFR 63.4766 does not apply to the permittee because it does not operate an add-on control device.

40 CFR 63.4767How do I establish the emission capture system and add-on control device operating limits during the performance test?

40 CFR 63.4767 does not apply to the permittee because it does not operate an add-on control device.

40 CFR 63.4768How do I establish the emission capture system and add-on control device operating limits during the performance test?

40 CFR 63.4768 does not apply to the permittee because it does not operate a thermal oxidizer, catalytic oxidizer, condenser, concentrator, carbon absorber or emission capture system.

40 CFR 63.4780Who implements and enforces this subpart?

This section does not apply to the facility.

40 CFR 63.4781What definitions apply to this subpart?

The definitions of this section apply to the facility.

40 CFR 63, Subpart KKNational Emission Standards for Hazardous Air Pollutants for the Printing and Publishing Industry

This subpart establishes compliance options, operating requirements, and work practice requirements for hazardous air pollutants (HAP) emitted from existing and new facilities at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated manufacturing facilities that are a major source of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the compliance options, operating requirements, and work practice requirements for printing and publishing facilities that are a major source of HAP emissions. The requirements of this subpart which pertain to product and packaging rotogravure, or wide-web flexographic printing presses apply to this facility because the facility performs rotogravure printing on substrate which is applied to products manufactured at facility and facility-wide HAP emissions of the facility had exceeded major source thresholds at one time. The requirements of this subpart which pertain to publication rotogravure do not apply to this facility.

40 CFR 63.820Applicability

In accordance with 40 CFR 63.820(a)(1), the provisions of this subpart apply because the permittee operates an existing facility that is a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, at product and packaging rotogravure are operated. 40 CFR 63.820(a)(2) through (6) do not apply because the permittee has not chosen to not meet the criteria of 40 CFR 63.820(a)(2)(i) and (ii).

40 CFR 63.821Designation of affected sources

In accordance with 40 CFR 63.821(a)(2), the affected sources subject to this subpart are product and packaging rotogravure presses plus any other equipment at that facility which the permittee chooses to include in accordance with paragraphs (a)(3) or (a)(4) of this section, except satisfying the criteria of paragraphs (a)(2)(i) and (ii) of this section.

40 CFR 63.822Definitions

The definitions of this section apply to the facility.

40 CFR 63.823Standards: General

This section and Table 1 of Subpart KK applies to this permittee as specified.

40 CFR 63.824Standards: Publication rotogravure printing

This section does not apply because the permittee does not own or operate a publication rotogravure printing press.

40 CFR 63.825Standards: Product and packaging rotogravure and wide-web flexographic printing

In accordance with 40 CFR 63.825(a), the permittee must comply with the May 30, 1999 compliance date specified in 40 CFR 63.826(a) because the permittee operates an existing affected source, a product and packaging rotogravure or wide-web flexographic printing press. The permittee shall demonstrate compliance with this standard by following one of the procedures in 40 CFR 63.825(b)(1) through (b)(6). 40 CFR 63.825(b)(7) through (10), 40 CFR 63.825(c), and 40 CFR 63.825(d) do not apply because the permittee does not operate a capture system and control device, and it does not operate a solvent recovery device to control emissions. 40 CFR 63.825(e) is an applicable requirement because it references 40 CFR 63.825(b)(6), which is also an applicable requirement. 40 CFR 63.825(f)(1) through (f)(4), (f)(7), (g) and (h) do not apply because the permittee does not operate a solvent recovery device, oxidizer, or a capture system and control device to control emissions.

40 CFR 63.826Compliance dates

In accordance with 40 CFR 63.826(a), the compliance date of May 30, 1999 applies because it is an existing facility. 40 CFR 63.826(c) will apply if the facility undergoes reconstruction.

40 CFR 63.827Performance test methods

40 CFR 63.827(a), 63.827(d), 63.827(e) and 63.827(f) do not apply because the permittee does not operate a control device to comply with the requirements of 40 CFR 63.824–63.825. In accordance with 40 CFR 63.827(b) if the weight fraction organic HAP values are not determined using the procedures in paragraphs (b)(2) of 40 CFR 63.827, the permittee must submit an alternative test method for determining their values for approval by the Administrator in accordance with 40 CFR 63.7(f). The recovery efficiency of the test method must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.

40 CFR 63.827(b)(1) and 63.827(c) do not apply because the permittee does not operate a publication rotogravure affected source. 40 CFR 63.827 (b)(2) and all subsequent subsections do apply to the permittee because the permittee operate a product and packaging rotogravure affected source

40 CFR 63.828Monitoring requirements

40 CFR 63.828(a) and 63.828(b) do not apply because the permittee does not operate a control device to comply with the requirements of 40 CFR 63.824–63.825.

40 CFR 63.829Recordkeeping requirements

40 CFR 63.829(a) and Table 1 of 40 CFR 63 Subpart KK apply to the permittee. 40 CFR 63.829(b), 63.829(b)(1), and 63.829(b)(2) apply to the permittee. 40 CFR 63.829(b)(3) does not apply because 40 CFR 63.828(a) does not apply, and the permittee does not operate a continuous monitoring system. . 40 CFR 63.829(c) applies because 40 CFR 63.825 applies, and the permittee does not operate a continuous monitoring system. . 40 CFR 63.829(d) applies if the permittee commits to the criteria of 40 CFR 63.820(a)(2). 40 CFR 63.829(e) and 63.829(e)(1) applies if the permittee commits to the criteria of 40 CFR 63.821(b)(1). 40 CFR 63.829(e) and 63.829(e)(2) applies if the permittee commits to the criteria of 40 CFR 63.821(b)(2). 40 CFR 63.829(f), 63.829(f)(1), and 63.829(f)(2) apply to the permittee if it has chosen to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of 40 CFR 63.821(a)(2)(ii)(A).

40 CFR 63.830Reporting requirements
 40 CFR 63.830 and Table 1 of 40 CFR 63 Subpart KK apply to the facility.
 40 CFR 63.831Implementation and enforcement
 This section does not apply to the facility.

8. PERMIT ANALYSIS

This section describes only the changes made to the permit as a result of this permitting action. Existing permit conditions are identified as “Existing Permit Conditions”, and revised permit conditions are identified as “Revised Permit Conditions.”

8.1 Permit Conditions

Wood Processing and Handling

- Permit Condition 3.1 contains the reference to the visible emission requirements of Permit Condition 2.7. Compliance with Permit Condition 3.1 shall be demonstrated through Permit Condition 3.2.
- Permit Condition 3.2 has been established to assure that the facility is operated in a manner similar to that presented in the modeling analysis that was used to demonstrate that the facility would not cause or contribute to a violation of any applicable ambient air quality standard.

Coating and Gluing

- Permit Condition 4.3.1 contains the HAP emission limit as taken from 40 CFR 63.4690. Permit Condition 4.3 specifies, by citing 40 CFR 63.4683, the compliance date of 40 CFR 63, Subpart QQQQ.
- Compliance with Permit Condition 4.3.1 shall be demonstrated through the compliance options of Permit Condition 4.3.2. In addition, if, in accordance with Permit Condition 4.3.2, the permittee chooses to demonstrate compliance with Permit Condition 4.3.1 using the compliant materials option of 40 CFR 63, Subpart QQQQ, the permittee shall demonstrate initial and continuous compliance in accordance with Permit Conditions 4.5, and 4.5.1 through 4.5.3.
- If, in accordance with Permit Condition 4.3.2, the permittee chooses to demonstrate compliance with Permit Condition 4.3.1 using the emission rate without add-on controls option of 40 CFR 63, Subpart QQQQ, the permittee shall demonstrate initial and continuous compliance in accordance with Permit Conditions 4.6, and 4.6.1 through 4.6.3.
- Permit Conditions 4.4 through 4.4.2 contain the general requirements and provisions of 40 CFR 63, Subpart QQQQ. Specifically, Permit Condition 4.4.1 contains the requirements for demonstrating compliance with Permit Condition 4.3.2. Permit Condition 4.4.2 contains the requirements which reference the General Provisions of 40 CFR 63.1 through 63.15 listed in Table 4 of Subpart QQQQ that applies to it.
- Permit Condition 4.12 through 4.12.3 contain the applicable notification, reporting and recordkeeping requirements of 40 CFR 63, Subpart QQQQ necessary for determining compliance with Permit Condition 4.3.2.

Printing

- Permit Condition 5.1 contains facility-wide VOC emission limit requested by the facility. Permit Conditions 5.7 through 5.9 establish the operating, monitoring and recordkeeping requirements that assure compliance with Permit Condition 5.1.
- Permit Condition 5.2 establishes the facility-wide HAP emission limits below major source thresholds. Permit Conditions 5.5 through 5.8, and 5.10 established the operating, monitoring and recordkeeping requirements that assure compliance with Permit Condition 5.4.
- Permit Condition 5.3 and 5.3.1 contain the HAP emission limits established by 40 CFR 63 Subpart KK. Compliance with Permit Condition 5.3 is demonstrated through the general requirements and provisions of Permit Conditions 5.4 and 5.4.1, and the performance test methods, monitoring, recordkeeping, and reporting requirements of Permit Conditions 5.11 through 5.11.4.

9. INSIGNIFICANT ACTIVITIES

Listed below are the insignificant activities described by the source in accordance with IDAPA 58.01.01.317(b)(i)

Table 7.1 - INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
Operation of Tanks less than 260 gallon capacity	IDAPA 58.01.01.317.01.b.i.(1)
Operation of Tanks less than 1,100 gallon capacity	IDAPA 58.01.01.317.01.b.i.(2)
Operation of Tanks less than 10,000 gallon capacity	IDAPA 58.01.01.317.01.b.i.(3)
Operation of Propane Tank less than 40,000 gal capacity	IDAPA 58.01.01.317.01.b.i.(4)
Batch solvent distillation, not greater than fifty-five (55) gallons batch capacity.	IDAPA 58.01.01.317.01.b.i.(15)
Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than five million (5,000,000) Btu/hr.	IDAPA 58.01.01.317.01.b.i.(18)
Surface coating, aqueous solution or suspension containing less than one percent (1%) volatile organic compounds.	IDAPA 58.01.01.317.01.b.i.(25)
emission units or activities with potential emissions less than or equal to the significant emission rate as defined in Section 006 and actual emissions less than or equal to ten percent (10%) of the levels contained in Section 006 of the definition of significant and no more than one (1) ton per year of any hazardous air pollutant.	IDAPA 58.01.01.317.01.b.i.(30)
Welding	IDAPA 58.01.01.317.01.b.i.(9)
Storage and handling of water-based lubricants for metal working	IDAPA 58.01.01.317.01.b.i.(27)

10. ALTERNATIVE OPERATING SCENARIOS

The facility did not request any alternative operating scenarios. OR provide the alternative operating scenario(s) and all information required by IDAPA 58.01.01.314.08 and 322.04.

11. TRADING SCENARIOS

The facility did not request any trading scenarios.

12. COMPLIANCE SCHEDULE

12.1 Compliance Plan

No compliance plan has been developed for this facility.

12.2 Compliance Certification

The facility is required to periodically certify compliance in accordance with General Provision 21. The facility shall submit an annual compliance certification for each emissions unit to DEQ and EPA, in accordance with IDAPA 58.01.01.314.10. The compliance certification report shall address the compliance status of each emissions unit with the terms and conditions of this permit.

13. PERMIT REVIEW

13.1 Regional Review of Draft Permit

DEQ provided the draft permit to its **Boise Regional Office** on March 1. Comments were received **DATE** and have been incorporated into the permit. **OR The regional office did not have any comments regarding the draft permit.**

13.2 Facility Review of Draft Permit

The facility did not request a draft copy of the permit.

13.3 Public Comment

In accordance with IDAPA 58.01.01.364, a public comment period on the draft Tier I operating permit and application materials shall be provided.

14. ACID RAIN PERMIT

This facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements do not apply.

15. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

16. RECOMMENDATION

Based on the Tier I operating permit application and review of state rules and federal regulation, staff recommend that DEQ issue proposed Tier I Operating Permit No. T1-060054 to Woodgrain Millwork for its Fruitland millwork facility. This permit modifies and renews the facility's existing Tier I operating permit. The project does not involve PSD permitting requirements.

AC Permit No. T1-060054

Appendix A

Woodgrain Millwork, Inc., Fruitland

Tier I Operating Permit No. T1- 060054

Facility ID No. 075-00001

AIRS Data Entry Form

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO ₂	B						U
NO _x	B						U
CO	B						U
PM ₁₀	B		B				U
PT (Particulate)	B						U
VOC	A				A	U	
THAP (Total HAPs)	B				B		U
			APPLICABLE SUBPART				
					KK, QQQQ		

- ^A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class “A” is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- ^B = Actual and potential emissions below all applicable major source thresholds.
- ^C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).
- ^{NA} = Not applicable as defined in IDAPA 58.01.01.579, constructed prior to baseline dates.